

REMARKS

Reconsideration of the present application is respectfully requested in view of the following remarks. Prior to entry of this response, Claims 1-17 and 21-23 were under consideration in the application, of which Claims 1, 12, and 21 are independent. Claims 18-20 have been previously withdrawn from consideration. In the Final Office Action dated November 30, 2006, Claims 1-17 and 21-23 were rejected under 35 U.S.C. 103(a). Following this response, Claims 1-17 and 21-23 remain under consideration in this application. Applicant hereby addresses the Examiner's rejections in turn.

I. **Interview Summary**

Applicant thanks Examiner Nguyen for the courtesy of a telephone interview on January 10, 2007, requested by the undersigned to discuss the rejection of the current claims under 35 U.S.C. § 103. During the interview, Applicant asserted that the claims as currently amended are patentable over the currently cited references. No agreement was reached regarding patentability.

II. **Rejection of the Claims Under 35 U.S.C. § 103(a)**

In the Final Office Action dated November 30, 2006, the Examiner rejected Claims 1-17 and 21-23 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Published Patent Application No. US 2002/0032705 ("Higashiyama") in view of U.S. Patent No. 5,633,957 ("Robinson"). Claims 1, 12, and 21 have been amended, and Applicant respectfully submits that the amendments overcome this rejection and add no new matter.

Amended Claim 1 is patentably distinguishable over the cited art for at least the reason that it recites, for example, "the plurality of content-based guidelines comprising vertical lines and horizontal lines, the vertical lines being attached to content features of the existing object and the horizontal lines being aligned to text comprising the existing object wherein applying the rules to determine which one of the plurality of content-based guidelines is dominant comprises one of the following: using guideline hierarchy and applying the rules with guideline dominance being a function of page position." In addition, amended Claim 12 is patentably distinguishable over the cited art for at least the reason that it recites, for example, "a plurality of content-based guidelines comprising vertical lines and horizontal lines, the vertical lines being attached to content features of the dominant existing object and the horizontal lines being aligned to text comprising the dominant existing object wherein at least one of the vertical lines intersects substantially perpendicularly with at least one of the horizontal lines." Furthermore, amended Claim 21 is patentably distinguishable over the cited art for at least the reason that it recites, for example, "the plurality of content-based guidelines comprising vertical lines and horizontal lines, the vertical lines being attached to content features of the existing object and the horizontal lines being aligned to text comprising the existing object, the plurality of content-based guidelines configured to move with the existing object when the existing object is moved." Support for these amendments can be found in the specification at least on page 13, lines 13-25, page 14, lines 9-16, and page 23, lines 3-8.

In contrast, *Higashiyama* at least does not disclose the aforementioned recitations. As stated by the Examiner, *Higashiyama* does not disclose content-based

guidelines being selected from a plurality of content-based guidelines by applying rules to determine which one of the plurality of content-guidelines is dominate. (See Office Action, page 5, lines 6-9.) Furthermore, Applicant respectfully submits that a plurality of content-based guidelines comprising vertical lines attached to content features of a dominant existing object and horizontal lines aligned to text comprising the dominant existing object is not disclosed in *Higashiyama*. Rather *Higashiyama* is silent regarding these recitations.

Furthermore, *Robinson* does not overcome *Higashiyama*'s deficiencies. *Robinson* merely discloses finding a positional guidelines for words. (See col. 10, lines 42-43.) The positional guideline in *Robinson* is not necessarily the positional guideline for every character in a word, but will instead be the "average" positional guideline for the entire word. (See col. 10, lines 43-45.) *Robinson*'s positional guideline can be used for alignment for the word with other words. (See col. 10, lines 45-47.) As shown in *Robinson*'s FIG. 10, all the individual character baselines in the word "plop" are either above or below the entire word's baseline. (See col. 10, lines 47-50.) Consequently, *Robinson* merely discloses a positional guidelines for words. Nowhere in *Robinson* does it teach or suggest content-based guidelines comprising vertical lines and horizontal lines. Rather *Robinson* merely discloses just one positional guideline, not content-based guidelines comprising vertical lines and horizontal lines. Accordingly, like *Robinson*, because *Robinson* does not teach or suggest content-based guidelines comprising vertical lines and horizontal lines, it does not teach or suggest applying rules to content-based guidelines comprising vertical lines and horizontal lines. *Robinson* is completely silent regarding any interchange between content-based guidelines

comprising vertical lines and horizontal lines, much less applying rules to select from vertical lines and horizontal lines comprising the content-based guidelines.

Combining *Higashiyama* with *Robinson* would not have led to the claimed invention because *Higashiyama* and *Robinson*, either individually or in combination, at least do not disclose or suggest “the plurality of content-based guidelines comprising vertical lines and horizontal lines, the vertical lines being attached to content features of the existing object and the horizontal lines being aligned to text comprising the existing object wherein applying the rules to determine which one of the plurality of content-based guidelines is dominant comprises one of the following: using guideline hierarchy and applying the rules with guideline dominance being a function of page position,” as recited by amended Claim 1. Furthermore, *Higashiyama* and *Robinson*, either individually or in combination, at least do not disclose or suggest “a plurality of content-based guidelines comprising vertical lines and horizontal lines, the vertical lines being attached to content features of the dominant existing object and the horizontal lines being aligned to text comprising the dominant existing object wherein at least one of the vertical lines intersects substantially perpendicularly with at least one of the horizontal lines,” as recited by amended Claim 12. In addition, *Higashiyama* and *Robinson*, either individually or in combination, at least do not disclose or suggest “the plurality of content-based guidelines comprising vertical lines and horizontal lines, the vertical lines being attached to content features of the existing object and the horizontal lines being aligned to text comprising the existing object, the plurality of content-based guidelines configured to move with the existing object when the existing object is moved,” as recited by amended Claim 21. Accordingly, independent Claims 1, 12, and 21 each

patentably distinguishes the present invention over the cited art, and Applicant respectfully requests withdrawal of this rejection of Claims 1, 12, and 21.

Dependent Claims 2-11, 13-17, and 22-23 are also allowable at least for the reasons described above regarding independent Claims 1, 12, and 21, and by virtue of their respective dependencies upon independent Claims 1, 12, and 21. Accordingly, Applicant respectfully requests withdrawal of this rejection of dependent Claims 2-11, 13-17, and 22-23.

III. Conclusion

Applicant respectfully requests that this Amendment After Final be entered by the Examiner, placing the claims in condition for allowance. Applicant respectfully submits that the proposed amendments of the claims do not raise new issues or necessitate the undertaking of any additional search of the art by the Examiner, since all of the elements and their relationships claimed were either earlier claimed or inherent in the claims as examined. Therefore, this Amendment should allow for immediate action by the Examiner.

Finally, Applicant respectfully submits that the entry of the Amendment would place the application in better form for appeal, should the Examiner dispute the patentability of the pending claims.

In view of the foregoing remarks, Applicant respectfully submits that the claimed invention, as amended, is neither anticipated nor rendered obvious in view of the prior art references cited against this application. Applicant therefore requests the entry of

this Amendment, the Examiner's reconsideration and reexamination of the application, and the timely allowance of the pending claims.

In view of the foregoing, Applicant respectfully submits that the pending claims, as amended, are patentable over the cited references. The preceding arguments are based only on the arguments in the Official Action, and therefore do not address patentable aspects of the invention that were not addressed by the Examiner in the Official Action. The claims may include other elements that are not shown, taught, or suggested by the cited art. Accordingly, the preceding argument in favor of patentability is advanced without prejudice to other bases of patentability. Furthermore, the Final Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicant declines to automatically subscribe to any statement or characterization in the Final Office Action.

Please grant any extensions of time required to enter this amendment and charge any additional required fees to our Deposit Account No. 13-2725.

Respectfully submitted,
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